

THE LAW OFFICE OF

**ELISA HYMAN, P.C.**

May 4, 2025

*VIA ECF*

The Hon. Robert W. Lehrburger  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

SO ORDERED:

05/05/2025



HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE

Re: *M.G., et al. v. NYC Dep't of Educ.*, 13-cv-4639 (SHS)(RWL)

Dear Judge Lehrburger:

Plaintiffs write to respectfully request a 10-day extension of time to file their motion for adverse inferences (“Motion”) against the City Defendants. The motion is currently due on May 6, 2025. *See* ECF No. 502. This is Plaintiffs’ first request for an extension.

I have had multiple briefs and filings due between May 1, 2025 and May 7, 2025 and I must address two medical issues. Additionally, Plaintiffs (and/or the City Defendants) intend to file a separate letter to address the fact that the City Defendants’ admissions are still under seal. Plaintiffs need to reference the City Defendants’ admissions as well as deposition testimony relating to the admissions in their upcoming Motion. However, the City Defendants and Plaintiffs must meet and confer further about their respective positions before bringing this issue in front of the Court.

The City Defendants consent to the 10-day extension, provided that the City Defendants also receive a corresponding extension to submit their response to June 16, 2025, which would make Plaintiffs’ reply due on June 23, 2025.

The State Defendants consent to the extension, provided that Plaintiffs are not filing a motion for adverse inferences against the State Defendants (Plaintiffs are not) and the schedule for expert discovery and summary judgment does not change as a result of the extension.

Thank you for Your Honor’s consideration of this request.

Respectfully submitted,  
*/s/ Elisa Hyman*

Elisa Hyman, Esq.

cc: Counsel of record